

## **REMARKS**

### **Rejections**

#### ***Rejections under 35 U.S.C. § 112, second paragraph***

##### **Claims 1-27**

Claims 1-27 stand rejected under 35 U.S.C. § 112, second paragraph as indefinite. Applicant respectfully reminds the Examiner the definiteness of claim language must be analyzed in light of the teachings of the prior art and the specification as it would be interpreted by one of skill in the art [MPEP 2173.02].

With regard to the term "graph rewriting," Applicant respectfully submits that one of ordinary skill in the video and audio encoding would understand the meaning of the term. Applicant also has provided a very concise definition at paragraph 25 of the specification. Indeed, all the terms the Examiner asserted are indefinite are also described in the specification. The Examiner's other questions, e.g. "where are [the pre-defined templates] stored" and "does Applicant's computerized method analyze the content of the multimedia prior to storage or after," are not proper rejections under § 112, second paragraph, because the claims can be understood without including this information in the claims.

Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-27 under 35 U.S.C. § 112, second paragraph.

#### ***Rejections under 35 U.S.C. § 102***

##### **Claims 1-27**

Claims 1-27 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Similarity Searching in Medical Image Databases*, Euripides G. M. Petrakis and Christos Faloutsos, IEEE Transactions on Knowledge and Data Engineering, Vol. 9, No. 3, May/June 1997, 435-447. Applicant respectfully submits that Petrakis does not teach or suggest each and every limitation of Applicant's invention as claimed in claims 1-27.

Petrakis discloses using "Attributed Relational Graphs" (ARGs) to search through a set of medical images to find possible matches, where the nodes the ARGs represent the

parts of human anatomy that appear in medical images and the edges represent the distances and positions. The medical images are generated by MRI, X-ray, tomography, etc. equipment.

Applicant respectfully submits that the Examiner has not considered Applicant's claims in their entirety. Applicant's invention is directed toward graph rewriting:

Graph rewriting is the process of combining graphs, replacing nodes with graphs, replacing edges with more complex configurations, and generating series of "production steps" to move from one graph to another [Specification, para. 25].

Petrakis does not disclose any rearranging of an ARG after it is originally created from the medical image. In addition, Applicant claims an input graph that represents a description scheme for multimedia data. As well known in the art, multimedia data is made up of more than one type of media data, e.g., video/audio, audio/text, etc. On the other hand, medical images are well known as being only still pictures and thus cannot be properly interpreted as multimedia data. Furthermore, the term "description scheme" is well-known in the art as referring to entities and relationships that appear in multimedia data. MPEG7 is one multimedia standard that incorporates description schemes [Specification: para. 5-8]. The ARGs in Petrakis are used to represent part of human anatomy that appear in medical images, and Petrakis does not teach or suggest using the ARGs to represent description schemes for multimedia data.

Accordingly, Applicant respectfully submits that the invention claims in claims 1-27 is not anticipated by Petrakis under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

### **SUMMARY**

Claims 1-27 are currently pending. In view of the foregoing remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-8300 x309.

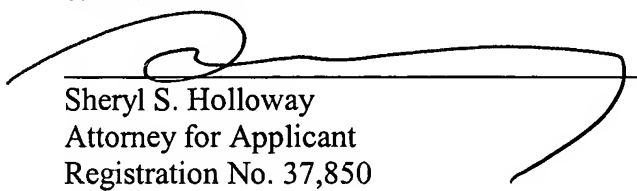
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

Dated: June 22, 2005



Sheryl S. Holloway  
Attorney for Applicant  
Registration No. 37,850

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(408) 720-8300 x309